



Rental Housing Integrity  
Improvement Project (RHIIP)  
Satellite Broadcast Training

## **UPFRONT INCOME VERIFICATION:**

The Key to Reducing Income and Rent  
Errors within HUD Rental Assistance  
Programs

*Using HUD's New Enterprise Income  
Verification (EIV) System to Reduce  
Tenant Misrepresentation of Income*

April 6, 2006



# Agenda

- ◆ Welcome & Introductions
- ◆ What's New in the EIV System (version 5.0)
- ◆ Security Awareness
- ◆ The Use of Upfront Income Verification to Simplify the Income Verification Process
  - How to use the EIV System
  - Income Discrepancy Resolution
- ◆ Getting Access to the EIV System
  - User Administration
- ◆ Questions & Answers Session



# Upfront Income Verification



# What is Upfront Income Verification (UIV)?

## **Upfront Income Verification:**

*the verification of income, before or during a family re-examination, through an independent source that systemically and uniformly maintains income information in computerized form for a large number of individuals.*

***“Automated Written 3<sup>rd</sup> Party Verification”***

# Use of UIV Data

- ◆ UIV data is used to **validate** tenant-reported income & supplement tenant-provided documents
- ◆ UIV data should **not** be used to calculate anticipated annual income (except as specified in HUD guidelines)
- ◆ When the tenant disputes the UIV data, the PHA must request written third party verification
- ◆ Reduce administrative burden
  - Reduce postage costs
  - Reduce telephone costs
  - Reduce ambiguity of written 3<sup>rd</sup> party verification
  - Reduce occurrence of **not** receiving requested written 3<sup>rd</sup> party verification from income providers





# Disclosure of UIV Data

- ◆ PHAs may **not** disclose (or re-disclose) UIV data to **any** third parties (UIV data is property of the Federal govt. and protected by Federal Privacy Act) – *Contact your local HUD Office*
- ◆ HUD OIG & Auditors may review file folder contents for audit and investigative purposes
- ◆ PHAs in FL may not maintain HUD-provided UIV data in tenant files
- ◆ PHAs may provide UIV data to the individual (only) to whom the record pertains
- ◆ UIV data of minors may be provided to the minor's parent or guardian
- ◆ UIV data of adult children may **not** be provided to HOH





# Disclosure of UIV Data (Continued)

- ◆ Public Law 108-199 (January 23, 2004) amended 42 USC 653(j) was amended to authorize HUD access to the National Directory of New Hires (NDNH) database
- ◆ HUD is authorized to use the NDNH data for the purpose of verifying the employment & income of tenants
- ◆ HUD may disclose the NDNH data only for purpose of verifying the employment & income of tenants
- ◆ HUD may only disclose the NDNH data to:
  - PHAs
  - HUD Inspector General
  - Attorney General



# Disclosure of UIV Data (Continued)

- ◆ PHAs are not authorized to disclose the NDNH data – except to the tenant upon request
- ◆ HUD provides HUD OIG with access to the EIV system





# Printing UIV Data

- ◆ Click on the Printer-friendly version button and a new window will open up to enable the user to print a household income details report
- ◆ Press Ctrl+P or right click in new window and select print to print out the income details report
- ◆ Report will include information for all household members
- ◆ Include in tenant file folder with re-exam documents (*except Florida program administrators – print ICN from household summary report tab to document EIV use*); or
  - Maintain UIV data in separate, locked files & labeled “Confidential – Protected by Federal Privacy Act”

# Verification Hierarchy

- ◆ **Upfront Income Verification (UIV)**
  - *Highest level (strongly encouraged to use)*
- ◆ **Written Third Party Verification**
  - High level (mandatory if UIV is not available, or UIV data differs substantially and tenant disputes)
- ◆ **Oral Third Party Verification**
  - Medium level (mandatory if written 3<sup>rd</sup> party verification is not available)
- ◆ **Tenant Provided Documents (Document Review)**
  - Medium-Low level (supplement UIV; or when higher level of verification is not available, use on provisional basis)
- ◆ **Tenant Declaration**
  - Low level (use as a last resort when higher levels of verification is not available)





# Simplifying The Income Verification Process

- ◆ The *old* way of doing business:
  - Tenant (does not) reports income & provides documents
  - PHA requests written 3<sup>rd</sup> party verification of tenant-reported income from source
  - PHA uses written 3<sup>rd</sup> party verification to calculate anticipated annual income
- ◆ The *new* way of doing business:
  - Tenant (does not) reports income
  - Tenant provides PHA with **current** documentation
  - PHA consults EIV system & prints income details report
  - If additional information is not needed, PHA uses current tenant provided documents to calculate anticipated annual income (If additional information is needed, PHA will use most current and reliable info)



# Simplifying The Income Verification Process (Continued)

## File Documentation -

### ◆ Acceptable Verifications:

- UIV+Current tenant provided documents; or
- UIV+Current tenant provided documents+Written 3<sup>rd</sup> party verification *[Required when tenant disputes UIV data or PHA requires additional information]*

**Note:** Tenant-provided documents should be dated within the last **60** days of the reexamination interview date. Pay stubs should be current and consecutive!



# Tenant Obligation To Supply PHA/HUD With Information

## ◆ 24 CFR 960.259 & 982.551

- The family **must** supply any information that the PHA or HUD determines is necessary in the administration of the program...
- The family **must** supply any information requested by the PHA or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition in accordance with HUD requirements



# Projecting Annual Income When UIV Data is Available

- ◆ HUD guidelines for using UIV data consistently and uniformly
- ◆ Substantial difference: one that is \$200 or more per month. (Equates to \$2,400+ a year)





# Projecting Annual Income When UIV Data is Available (Continued)

- ◆ When UIV data is **not** substantially different than tenant-reported income:
  - If UIV data is **less** than tenant-reported income, use tenant-provided documents to calculate anticipated annual income
  - If UIV data is **greater** than tenant-reported income, use UIV data to calculate anticipated annual income, **unless** tenant can provide the PHA with acceptable documentation to verify a change in circumstances



# Projecting Annual Income When UIV Data is Available (Continued)

- ◆ When UIV data is substantially different than tenant-reported income:
  - PHA must request written third party verification from the discrepant income source [24 CFR 5.236(3)(I)]

**Note:** Not required if tenant does **not** dispute the UIV data and the PHA does not require additional information



# **Introduction of HUD's EIV System**



# UIV Data in EIV

- ◆ Access data at any time, regardless of re-exam date – even during interim re-exams!
- ◆ Two years of wage and employment information
- ◆ Current SS/SSI benefit information and last 8 changes to benefit
- ◆ Available for existing tenants only – *not applicants\**

*\* Exceptions: 50058s with action types (9) annual re-exam searching voucher and (10) issuance of voucher*



# Timing of Quarterly & Monthly Income & Employment Data

- ◆ There are time frames associated with the reporting of quarterly income and employment data
- ◆ Employers and State unemployment offices are required to report calendar quarterly data within specific timeframes



# Income & Employment Data Reporting Time Frames

- ◆ **New Hire Employment Information**
  - Employers are required to transmit by **2 monthly** transmissions
- ◆ **Quarterly Wage (Non-Federal)**
  - States are required to transmit within **4 months** after the end of the reporting period
- ◆ **Quarterly Wage (Federal)**
  - Federal agencies are required to transmit no later than **1 month** after the end of the reporting period
- ◆ **Quarterly Unemployment Compensation**
  - States are required to transmit within **1 month** after the end of the reporting period





# Availability of Quarterly Federal Wage & Unemployment Income Data

Quarter	Approximate Availability Date
<b>1<sup>st</sup></b> (January 1 <sup>st</sup> – March 31 <sup>st</sup> )	May 15 <sup>th</sup> or earlier
<b>2<sup>nd</sup></b> (April 1 <sup>st</sup> – June 30 <sup>th</sup> )	August 15 <sup>th</sup> or earlier
<b>3<sup>rd</sup></b> (July 1 <sup>st</sup> – September 30 <sup>th</sup> )	November 15 <sup>th</sup> or earlier
<b>4<sup>th</sup></b> (October 1 <sup>st</sup> – December 31 <sup>st</sup> )	February 15 <sup>th</sup> or earlier



# Availability of Quarterly Wage Data

Quarter	Approximate Availability Date
<b>1<sup>st</sup></b> (January 1 <sup>st</sup> – March 31 <sup>st</sup> )	August 15 <sup>th</sup> or earlier
<b>2<sup>nd</sup></b> (April 1 <sup>st</sup> – June 30 <sup>th</sup> )	November 15 <sup>th</sup> or earlier
<b>3<sup>rd</sup></b> (July 1 <sup>st</sup> – September 30 <sup>th</sup> )	February 15 <sup>th</sup> or earlier
<b>4<sup>th</sup></b> (October 1 <sup>st</sup> – December 31 <sup>st</sup> )	May 15 <sup>th</sup> or earlier



# Using the EIV System

# Logging On To EIV



WebThority Login - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Back Forward Stop Search Favorites Media Print Mail

Address [https://www11.hud.gov/\\_AuthAgents/aGibn5h3dA@MDph2F9hdRo/ad\\_auth?ReqURL=https://www11.hud.gov:443/HUD\\_Systems%3FWTPostBody%3dRole=d](https://www11.hud.gov/_AuthAgents/aGibn5h3dA@MDph2F9hdRo/ad_auth?ReqURL=https://www11.hud.gov:443/HUD_Systems%3FWTPostBody%3dRole=d) Go Links

**User Login** housing | mail | help | search | home

Secure Systems  
Single Sign On


User ID   
Password

Guest ☐

**ATTENTION:** This computer system, and all the systems associated with this system for User Authorization and Authentication, are protected by a computer security system; unauthorized access to these systems is not permitted; and usage may be monitored.

**NOTE:** There is an inactivity timeout of 30 minutes. Please save your work periodically to avoid being logged out

Content updated February 11, 2005

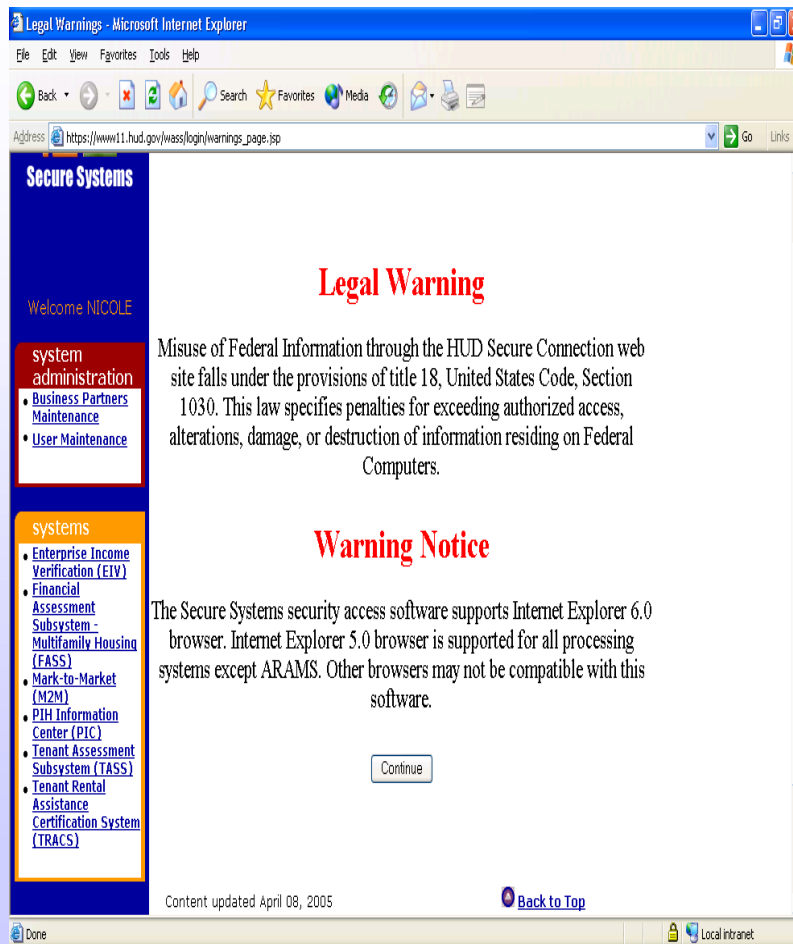
 U.S. Department of Housing and Urban Development  
451 7th Street S.W., Washington, DC 20410  
Telephone: (202) 708-1112 TTY: (202) 708-1455

[Home](#) | [Privacy Statement](#)

Done Local intranet

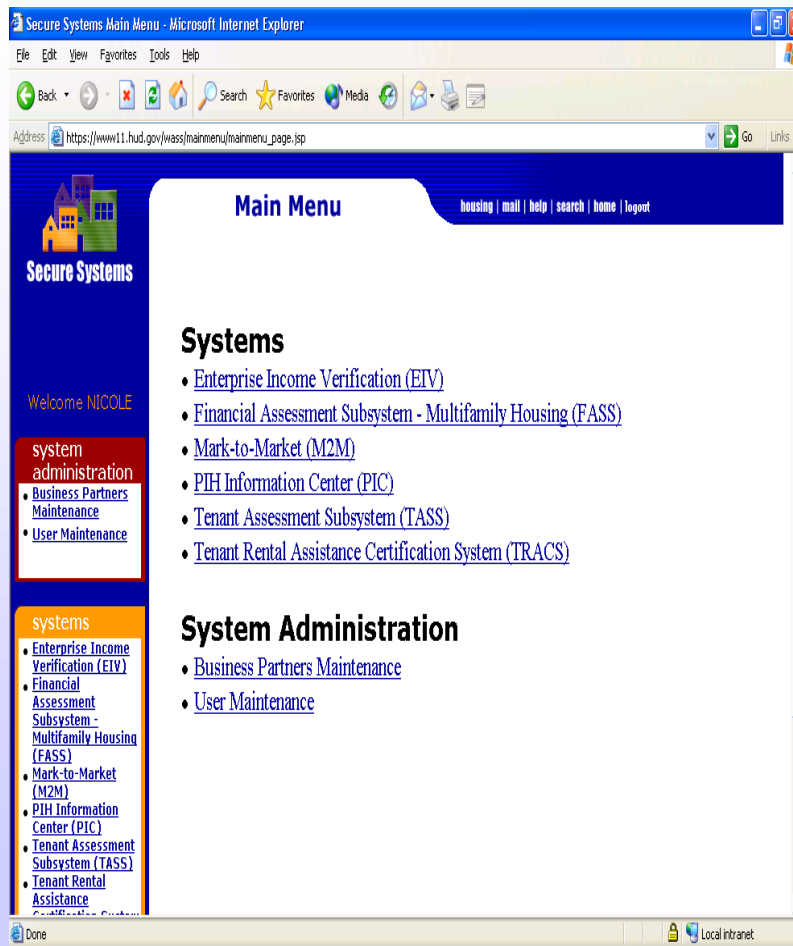
- ◆ URL:  
[https://www11.hud.gov/HUD\\_Systems](https://www11.hud.gov/HUD_Systems)
- ◆ User types in WASS ID and Password
- ◆ Click on Login or press enter to logon to system

# Logging On To EIV (Continued)



- ◆ Click continue at the Legal Warning & Warning Notice screen
- ◆ There are penalties for misuse and/or unauthorized use of data contained in Federal systems


# Logging On To EIV (Continued)




- ◆ Click on the Enterprise Income Verification (EIV) link to access the system
- ◆ Note: If user does not see EIV link make sure WASS ID has PIC and EIV access rights assigned to it and user ID has not expired!



# Legal Warnings/Privacy Act





- [Back to Secure Systems](#)

## Enterprise Income Verification

[HUD Home](#) [PIH Home](#) [EIV Home](#) [Search](#)

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### Legal Warning

Misuse of Federal Information through the HUD Secure Connection web site falls under the provisions of Title 18, United States Code, Section 1030. This law specifies penalties for exceeding authorized access, alterations, damage, or destruction of information residing on Federal Computers.

### Notice of Your Responsibility for Security

Information contained in this system is subject to the Privacy Act of 1974 (5 U.S.C. 552a, as amended). Only authorized persons in the conduct of official business may use private information contained in this system. Any individual responsible for unauthorized disclosure or misuse of private, personal information may be subject to fine of up to \$5,000 for each violation.


### Authorization for the Release of Information


The data in the EIV system includes private and confidential information. Staff at Public Housing Agencies and PHA-hired private management agents may not view private information unless there is a signed Authorization for the Release of Information and Privacy Notice (Form HUD-9886 or equivalent consent form satisfying requirements under 24CFR5.230) in the household's file for the head of household and the spouse of the head of household, or co-head, regardless of age, and for each adult member in the household.

☐ I acknowledge that I understand that this system contains personal information covered by the Privacy Act of 1974 (5 U.S.C. 552a, as amended). Access to this data is solely for governmental purposes. Any individual responsible for unauthorized disclosure or misuse of the private, personal information contained in this information system may be subject to civil and criminal penalties under the Privacy Act.

Continue


# Getting Started in EIV



**Enterprise Income Verification**

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- ◆ [Back to Secure Systems](#)
- Threshold Report**
  - ◆ [Threshold Report](#)
- Income Information**
  - ◆ [By Head of Household](#)
  - ◆ [By Reexamination Month](#)
- User Administration**
  - ◆ [By Roles](#)
  - ◆ [By Users](#)
  - ◆ [PHA Access Requests](#)
  - ◆ [Administer HUB Users](#)
  - ◆ [User Maintenance](#)
  - ◆ [User Certification](#)
  - ◆ [User Certification Report](#)
  - ◆ [User Role History Report](#)
    - [By User](#)
    - [By User Administrator](#)
- Audit Reports**
  - ◆ [PHA Usage Report](#)

[User Manual](#)

## Welcome Nicole X Lawyer

### Timeout Notice!

Your EIV Session will time out after thirty (30) minutes of inactivity, closing the session and logging you off the system. The page that was active at the time the session timed out will continue to display. Before you can perform another system function, after a time out you will be prompted to log on again.

### Notice of Browser Compatibility

The EIV System supports browser version Internet Explorer 6.0 and higher. Other browsers may not be compatible with this software.

# Accessing the Threshold Report

Click on the  
Threshold  
Report link to  
access report

- 
- Back to Secure Systems
  - Program Office Selection
  - Threshold Report**
  - Threshold Report
  - Income Information**
  - By Head of Household
  - By Reexamination Month
  - User Administration**
  - By Roles
  - By Users
  - PHA Access Requests
  - Administer HUB Users
  - User Maintenance
  - User Certification
  - User Certification Report
  - User Role History Report
    - By User
    - By User Administrator

# Threshold Report - Report Selection (Income Discrepancy Report)

## Enterprise Income Verification

[Home](#)[Home](#)[Home](#)[Search](#)[Email](#)

Threshold Report >> Report Selection

### Select Program Type, Reexamination Month and Threshold Value:

Program Type: All PIH Programs

Reexamination Month: All

Threshold: 100 %

### Select Region:

☒ HUD HQ

☐ HUB 10HSEA Seattle Hub

☐ FO 0APH SEATTLE HUB OFFICE

☐ TARC PB1 Cleveland TARC

☐ PHA AK001 AHFC

### Select Report Partition Size:

PHA Report: 50 Households / Partition

Get Report

# Threshold Report – PHA Statistics

Threshold Report >> [Report Selection](#) >> PHA Statistics

PHA Statistics as of Mar 12, 2006			
PHA	MD002 Baltimore City Housing Authority		
Threshold Percentage	100 %		
Reexamination Month	All		
Program Type	<b>ALL</b>	<b>Public Housing</b>	<b>Section 8</b>
Total Number of Households Evaluated	10,725	3,352	7,373
Households that Exceed Threshold	767	140	627
Percentage of households exceeding threshold	07.15%	04.18%	08.50%
Outliers (Threshold * 2)	0	0	0
Percentage of households exceeding threshold that are outliers	00.00%	00.00%	00.00%
Annual Income Discrepancy (Actual)	(\$7,026,404.95)	(\$1,281,402.62)	(\$5,745,002.33)
Annual Income Discrepancy (Annualized Last Quarter)	(\$7,177,179.34)	(\$1,244,963.81)	(\$5,932,215.53)

[Printer-Friendly Version](#)

Sorted By: **Annual Income Discrepancy (actual)** [Descending]

**(\$58,775.86) - (\$21,351.77)**

(\$21,259.09) - (\$17,788.42)

(\$17,731.61) - (\$14,246.14)

(\$14,194.47) - (\$11,984.46)

(\$11,983.00) - (\$10,215.53)

(\$10,178.49) - (\$8,768.32)

(\$8,763.91) - (\$7,400.17)

(\$7,357.17) - (\$6,338.46)

(\$6,323.00) - (\$5,574.08)

(\$5,571.00) - (\$4,911.61)

(\$4,905.16) - (\$4,199.29)

(\$4,183.95) - (\$3,628.52)

(\$3,610.00) - (\$2,917.87)

(\$2,913.88) - (\$2,292.65)

(\$2,240.00) - (\$1,028.72)

(\$984.30) - (\$623.33)

# Threshold Report – Listing of Discrepant Households

Double click on SSN to view details

1 to 50 of 767 Households

Next

Households Exceeding Threshold						
SSN	Last Name	Program Type	Project	Annual Income Discrepancy (Actual)	Annual Income Discrepancy (Annualized Last Quarter)	Outlier
	YOUNG PURNELL	Public Housing	MD002021	(\$58,775.86)	(\$56,476.99)	N
	BROWN	Sec. 8 Vouchers		(\$51,141.13)	(\$64,189.83)	N
	BROWN	Sec. 8 Vouchers		(\$49,345.62)	(\$60,994.49)	N
	FOYE	Sec. 8 Vouchers		(\$47,126.97)	(\$44,598.83)	N
	Gwynn	Sec. 8 Vouchers		(\$45,841.61)	(\$72,247.24)	N
	RAWLINGS	Public Housing	MD002012	(\$44,783.16)	(\$8,048.09)	N
	Spears	Sec. 8 Vouchers		(\$44,111.78)	(\$53,708.67)	N
	HARRIS	Public Housing	MD002041	(\$40,309.14)	(\$15,869.04)	N



# Threshold Report – Detail

## Household Report

Head of Household Information		
Name:	RENAIRA YOUNG PURNELL	
Social Security Number:		
Type of Housing:	Public Housing	
Project:	BROOKLYN HOMES	
Effective Date of Action:	11/01/2005	
Annual Reexamination Date:	11/01/2006	
Projected Annual Wages and Benefits from Form HUD-50058:	\$0.00	
Period Of Income for Discrepancy Analysis	08/01/2004 - 07/31/2005	
Discrepancy Analysis	Actuals	Annualized Last Quarter
Reported Annual Wages and Benefits from EIV Data:	\$58,775.86	\$56,476.99
Amount of Annual Income Discrepancy:	(\$58,775.86)	(\$56,476.99)
Amount of Monthly Income Discrepancy:	(\$4,897.99)	(\$4,706.42)
Percentage of Income Discrepancy:	(100%)	(100%)

Note: Negative numbers represent potential under reporting of income. Please discuss this income discrepancy with the tenant. Positive numbers represent potential decrease in tenant

- ◆ Includes wage & benefit income reported on 50058 and reported by UIV sources
- ◆ Compares 50058 wage & benefit income to UIV income
- ◆ Provides monthly and annual discrepancy amount along with %

# Searching For Income Information By Re-examination Month – Reports Summary

## Enterprise Income Verification

[HUD Home](#) [PIH Home](#) [ENV Home](#) [Search](#)

Income Information >> [By Reexamination Month](#) >> Reports Summary

Select Program Type and Reexamination Month. Click Search to retrieve reports summary:

Select Program Type:

Section 8

Select Reexamination Month

June


Select Participant Code

MD002

Search

Double click here

Reports Summary as of January 26, 2006		
Report Type	Number of Households	Number of Members
<a href="#">Income Report</a>	851	1,164
<a href="#">Threshold Report</a>	191	--
<a href="#">Failed Verification Report</a>	194	239
<a href="#">No Income Report</a>	68	186



# Searching For Income Records By Re-examination Month – Summary Threshold Report

Enterprise Income Verification

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Income Information >> [By Reexamination Month](#) >> [Reports Summary](#) >> Threshold Report Summary

## Threshold Report Summary

Participant Code:	MD002 Baltimore City Housing Authority
Program Type:	All PIH Programs
Reexamination Month:	July
Households Exceeding Threshold:	186

[Download in Excel](#)


[1](#) [2](#) [3](#) [4](#)

1 - 50 of 186 Households

### Summary Reports

### Detail Reports

HH SSN	HH Last Name	Project	Annual Income Discrepancy (Actual)	Annual Income Discrepancy (Annualized last quarter)	Threshold Percentage
	PATE		(\$66,244.09)	(\$52,789.35)	(81.9%)
	HARDEN		(\$36,747.32)	(\$21,133.80)	(88.7%)
	JOHNSON		(\$31,789.57)	(\$27,306.28)	(85.07%)



# Searching For Income Records By Re-examination Month – Detail Threshold Report

Income Information >> [By Reexamination Month](#) >> [Reports Summary](#) >> Threshold Report Detail

Threshold Report Detail	
Participant Code:	MD002 Baltimore City Housing Authority
Program Type	All PIH Programs
Reexamination Month	July
Households Exceed Threshold	186

[1](#) [2](#) [3](#) [4](#)

1 - 50 of 186 Households

Summary Reports

**Detail Reports**

Head of Household Information		
Name:	PAMELA PATE	
Social Security Number:		
Program Type	Section 8	
Project:		
Effective Date of Action:	07/01/2005	
Annual Reexamination Date:	07/01/2005	
Projected Annual Wages and Benefits from Form HUD-50058:	\$14,639.00	
Period Of Income for Discrepancy Analysis	04/01/2004 - 03/30/2005	
Discrepancy Analysis	Actuals	Annualized Last Qua
Reported Annual Wages and Benefits from EIV Data:	\$80,883.09	\$67,428.35



# UIV Income Discrepancy Analysis

$$\frac{\text{PIC} - \text{UIV}}{\text{UIV}} \quad \text{Example: } \frac{\$0 - \$20,000}{\$20,000} = 100\%$$

Discrepancy amount = (\$20,000)

- ◆ Current 50058 income data is analyzed weekly
- ◆ Compares PIC and UIV reported wages, unemployment benefits and social security benefits only
- ◆ Two discrepancy analysis calculated: actual & annualized last quarter (larger discrepancy in **bold**)
- ◆ Discrepancy must meet selected % threshold & \$2,400+ (annual discrepancy amount) to be included on report



# UIV Income Discrepancy Analysis (Continued)

- ◆ **Period of income for discrepancy analysis**
  - Identifies 12 month period of income considered for discrepancy calculation
- ◆ **Actual annual income discrepancy (Past actual earnings)**
  - Compares PIC *projected* wages and benefits to *actual* UIV data for a 12-month period (which ends 3 months prior to effective date of current 50058)
- ◆ **Annual income discrepancy: annualized last data quarter (Future projected earnings)**
  - Compares PIC *projected* wages and benefits to *projected* annualized last quarter data (last quarter data X 4 to annualize) [Projection of income for 12 months which ends 9 months after effective date of current 50058]



# UIV Income Discrepancy Analysis (Continued)



Head of Household Information		
Name:		
Social Security Number:		
Type of Housing:		
Project:	BROOKLYN	
Effective Date of Action:	11/01/2005	
Annual Reexamination Date:	11/01/2006	
Projected Annual Wages and Benefits from Form HUD-985:	\$0.00	
Period of Analysis:	08/01/2004 - 07/31/2005	
Discrepancy Analysis	Actuals	Annualized Last Quarter
Reported Annual Wages and Benefits from EIV Data:	\$58,775.86	\$56,476.99
Amount of Annual Income Discrepancy:	(\$58,775.86)	(\$56,476.99)
Amount of Monthly Income Discrepancy:	(\$4,897.99)	(\$4,706.42)
Percentage of Income Discrepancy:	(100%)	(100%)

Note: Negative numbers represent potential under reporting of income. Please discuss this income discrepancy with the tenant. Positive numbers represent potential decrease in tenant income.

Actual UIV income reported during 05/01/05 – 07/31/05  
Multiplied by 4 to annualize.  
Projected income for 08/01/05 – 07/31/06

Actual UIV income reported during 08/01/04 – 07/31/05



# **Income Discrepancy Resolution**



# Income Discrepancy Resolution

- ◆ Identify under reported income and/or unreported income sources
- ◆ The PHA may **not** take any adverse action based *solely* on UIV data
- ◆ Discuss the income discrepancy with the tenant
- ◆ Obtain additional documents from tenant and/or third party (if necessary)
- ◆ PHA may wish to obtain Social Security Earnings Statement (SSA Form 7004) for historical wage earnings (Form available on HUD's website)
- ◆ The PHA should verify effective dates of new and terminated income sources

# Income Discrepancy Resolution (Continued)

- ◆ Once the PHA has verified and validated the income discrepancy, the PHA should calculate the tenant retroactive rent due and initiate a repayment agreement and/or other corrective action
- ◆ Submit corrected 50058 to HUD
- ◆ Collect retroactive rent payment(s)
- ◆ Report delinquent debt to Credit Reporting Bureaus



# Federal Privacy Act

## 5 U.S.C 552a

- ◆ “In order to protect any individual whose records are used in a matching program, no recipient agency, non-Federal agency, or source agency may suspend, terminate, reduce or make a final denial of any financial assistance or payment under a Federal benefit program to such individual, or take other adverse action against such individual, as a result of information produced by such matching program, until the agency has independently verified the information.”

# Is the Discrepancy Valid or Invalid?

- ◆ What was the effective date of the unreported income?
  - If effective date is prior to re-examination interview date and no interim increase policy – the discrepancy is valid
  - If interim increase policy and tenant did not report – the discrepancy is valid
- ◆ Does your PHA have an interim increase policy?
  - If yes, look at annualized last quarter income discrepancy amount
  - If no, look at actual income discrepancy amount







# Valid Income Discrepancies

## Tenant Misrepresentation of Income

- ◆ **Valid Income Discrepancies:** are those discrepancies where:
  - the tenant failed to disclose an income source and/or under reported the amount of income that was effective as of the interview date of a mandatory re-examination of income; **and/or**
  - the tenant failed to report a change or increase in an income source and/or income amount as required by PHA's interim re-examination policy.

**Note:** *These income discrepancies result in tenant rent underpayments and HUD subsidy overpayments*



# Valid Income Discrepancies PHA Error

- ◆ **Valid Income Discrepancy Due to PHA Error:**

The PHA calculated household income based on the best available third party written verification, third party oral verification, and/or tenant provided documentation at the time of the re-examination interview. If the PHA had had access to UIV tools, the PHA would have made a more accurate income determination

- ◆ ***Retroactive rent repayment agreement not required***

- ◆ In cases where the PHA obtains additional income information via the EIV system (and verifies the UIV data with the tenant and/or 3rd party source) that would result in a more accurate income determination and the PHA policy allows for increases in rent (in between annual re-examinations), the PHA should adjust the rent accordingly to reduce the occurrence and amount of improper subsidy payments

**Note:** *These errors result in HUD subsidy overpayments*



# Invalid Income Discrepancies

- ◆ **Invalid Income Discrepancies:** are those discrepancies that are not a result of tenant error. These discrepancies may occur as a result of:
  - PHA error
  - Incorrect UIV data
  - Administrative circumstances



# Examples of Invalid Income Discrepancies

## ◆ PHA Errors:

### **50058 Reporting Errors on Section 7:**

- Income amount reported incorrectly
- Income source reported incorrectly
- Earned Income Disallowance (EID) reported incorrectly
- Omitted income



## Examples of Invalid Income Discrepancies (Continued)

### UIV Data Errors:

- ◆ There has been an incident of identity theft and someone else is using the tenant's SSN – *only the employer can correct this error*
- ◆ The income reported under a social security number is incorrectly listed under the tenant's SSN (example, employer error) – *only the employer can correct this error*
- ◆ The reporting agency (income data source) made an error in its records



# Documentation for Identity Theft

- ◆ When tenant disputes UIV data, the tenant should indicate in writing the reason for dispute and provide supporting documentation
- ◆ Supporting documents for identity theft:
  - Copy of police report (not a police report number); or
  - Notice from credit bureau regarding fraud alert placed on credit report or copy of credit report with fraud alert notice; or
  - Copy of identity theft report filing with the Federal Trade Commission; **and**
  - Copy of tenant's letter sent to employer to dispute information and request for correction; **and**
  - Any correspondence the tenant received from employer





# Information on Identity Theft

- ◆ If tenant believes that he/she is the victim of identity theft, the tenant should take the following three steps as soon as possible, and keep a record with the details of conversations and copies of all correspondence
- ◆ **1. File a report with the local police or the police in the community where the identity theft took place**
  - Then, get a copy of the police report. The tenant should provide the PHA with a copy of the report. If the police are reluctant to make a report, the tenant may ask to file a "Miscellaneous Incidents" report, or try another jurisdiction, such as the state police



# Information on Identity Theft (Continued)

## ◆ 2. The tenant should place a fraud alert on his/her credit reports, and review your credit reports

- Fraud alerts can help prevent an identity thief from opening any more accounts in the tenant's name. Contact the toll-free fraud number of any of the three consumer reporting companies below to place a fraud alert on your credit report. You only need to contact one of the three companies to place an alert. The company you call is required to contact the other two, which will place an alert on their versions of your report, too
- **Equifax:** 1-800-525-6285; [www.equifax.com](http://www.equifax.com); P.O. Box 740241, Atlanta, GA 30374-0241
- **Experian:** 1-888-EXPERIAN (397-3742); [www.experian.com](http://www.experian.com); P.O. Box 9532, Allen, TX 75013
- **TransUnion:** 1-800-680-7289; [www.transunion.com](http://www.transunion.com); Fraud Victim Assistance Division, P.O. Box 6790, Fullerton, CA 92834-6790



# Information on Identity Theft (Continued)

## ◆ 3. File a complaint with the Federal Trade Commission.

- By sharing your identity theft complaint with the FTC, you will provide important information that can help law enforcement officials across the nation track down identity thieves and stop them. The FTC can refer victims' complaints to other government agencies and companies for further action, as well as investigate companies for violations of laws the agency enforces
- You can file a complaint with the FTC using the online complaint form at [https://rn.ftc.gov/pls/dod/widtpubl\\$.startup?Z\\_ORG\\_CODE=PU03](https://rn.ftc.gov/pls/dod/widtpubl$.startup?Z_ORG_CODE=PU03) or call the FTC's Identity Theft Hotline, toll-free: 1-877-ID-THEFT (438-4338); TTY: 1-866-653-4261; or write Identity Theft Clearinghouse, Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580
- Be sure to call the Hotline to update your complaint if you have any additional information or problems

**Resource: Federal Trade Commission – [www.ftc.gov](http://www.ftc.gov)**



# Documentation for Employer Reporting Error

- ◆ When tenant disputes UIV data, the tenant should provide documentation to support claim of incorrect data, such as:
  - Copy of tenant's letter sent to employer to dispute information and request for correction
  - Any correspondence the tenant received from employer



## Examples of Invalid Income Discrepancies (Continued)

### ◆ Administrative Circumstances:

- Unreported/under reported income was effective after re-examination interview date
- No interim increase policy
- Recent decrease in tenant income (verified by PHA)



# Benefits of Resolving Income Discrepancies

- ◆ Increase available HAP funds (HCV – S8)
- ◆ Increase PHA rent revenue (Public Housing)
- ◆ Reduce HUD subsidy overpayments
- ◆ Reduce PHA income and rent errors
- ◆ Ensure limited and decreasing Federal funding serve as many eligible families as possible
- ◆ Improves income integrity in HUD rental assistance programs
- ◆ Deters future fraud





# **Access to EIV System User Administration**



# Getting Access to EIV

- ◆ PHA Executive Director (ED) or authorizing official identifies User Administrators, Security Administrators and HCV/PH Occupancy users
  - ◆ PHA ED or authorizing official signs EIV Access Authorization form and User signs User Agreement/Rules of Behavior forms
  - ◆ PHA Submits EIV Access Authorization and User Agreement/Rules of Behavior forms to HUD Field Office
  - ◆ HUD Field Office approves and grants PHA staff access to EIV
- \*\* All EIV users must have a WASS ID with active PIC & EIV access rights**



# Getting Access to EIV (Continued)

- ◆ Once HUD FO has approved the PHA User Administrator(s) within EIV:
  - PHA User Administer can create access requests for additional PHA staff in EIV by:
    - Selecting users from list displayed under User Administration - By Users (link on left)
    - Checking the applicable check boxes next to the desired roles
    - Don't forget to assign PH developments to PHA Occupancy – Public Housing users
  - HUD FO will approve PHA access requests for those users who have submitted the EIV Access Authorization and Rules of Behavior/User Agreement forms



# EIV User Roles

- ◆ **User Administrator:** ability to request access for staff, assign roles and developments to users(PH only), modify user roles and assignments, certify users for continued system access every calendar quarter, and remove assigned roles
- ◆ **Security Administrator:** ability to monitor staff access to system
- ◆ **PHA Occupancy-Public Housing:** ability to view income data of only Public Housing tenants within assigned developments
- ◆ **PHA Occupancy-Voucher:** ability to view income data of only Section 8 tenants



# EIV User Roles (Continued)

- ◆ A user may be assigned multiple roles
- ◆ The User Administrator should not be the Security Administrator\*
- ◆ The Security Administrator should not be the User Administrator\*
- ◆ PHA should have at least 2 User Administrators\*
- ◆ PHA should have at least 2 Security Administrators\*

\*Except within small PHAs



## EIV Users Roles (Continued)

- ◆ PHA should have at least 1 occupancy user for each program that the PHA administers
- ◆ Occupancy user roles should only be assigned to staff who need to have access to income data (need-to-know basis)
- ◆ Users assigned the PHA Occupancy-Public Housing role must be assigned to developments in order to view income data



# User Administration – By Users

Enterprise Income Verification

[Home](#) [PIH Home](#) [EIV Home](#) [Search](#) [Er](#)

User Administration >> By Users

Query/View users by:

☐ Last Name ☒ \*User ID

Search user  exact match

Select Region:

- |                                  |        |                                      |
|----------------------------------|--------|--------------------------------------|
| <input checked="" type="radio"/> | HUD HQ |                                      |
| <input type="radio"/>            | HUB    | ALL <input type="button" value="v"/> |
| <input type="radio"/>            | FO     | ALL <input type="button" value="v"/> |
| <input type="radio"/>            | TARC   | ALL <input type="button" value="v"/> |
| <input type="radio"/>            | PHA    | ALL                                  |

Click on “Search Users”  
to display list of users

View users by first letter of last name/User ID

[A](#) [B](#) [C](#) [D](#) [E](#) [F](#) [G](#) [H](#) [I](#) [J](#) [K](#) [L](#) [M](#) [N](#) [O](#) [P](#) [Q](#) [R](#) [S](#) [T](#) [U](#) [V](#) [W](#) [X](#) [Y](#) [Z](#)

\*All User Id's begin with C, I, H or M

# User Administration – By Users (Continued)

## Enterprise Income Verification

[Home](#) [PIH Home](#) [EIV Home](#) [Search](#)

User Administration >> [By Users](#) >> Search Results

Select All

Deselect All

Next >>

<< Back

Click in check box  
to select user(s). Then  
Click “Next” button

1 2  
1 - 50 of 52 Users

### User List

Action	Userid	First Name	Last Name	Code
<input type="checkbox"/>	MD9363	Paula	Hutchinson	MD002 Baltimore City Housing Authority
<input type="checkbox"/>	MK7036	Constance	Greene	MD002 Baltimore City Housing Authority
<input type="checkbox"/>	ML2720	Hazel	Sawyer	MD002 Baltimore City Housing Authority
<input type="checkbox"/>	ML5870	Brenda	Sanders-Brown	MD002 Baltimore City Housing Authority
<input type="checkbox"/>	ML7074	Juanita	Daniels	MD002 Baltimore City Housing Authority
<input type="checkbox"/>	ML7088	Hazel	Jenkins	MD002 Baltimore City Housing Authority

# User Administration – By Users (Continued)

Enterprise Income Verification

[Home](#) [PIH Home](#) [EIV Home](#) [Search](#)

User Administration - By Users

## Users Profile Details

List of Selected User(s)

[<< Back](#)

User ID	First Name	Last Name	Code
MK7036	Constance	Greene	MD002

[Revoke All](#)

## List of Roles

Action	Role
<input type="checkbox"/>	PHA Occupancy - Public Housing
<input checked="" type="checkbox"/>	PHA Occupancy - Voucher
<input type="checkbox"/>	PHA Security Administrator
<input type="checkbox"/>	PHA User Admin
<a href="#">Add</a>	<a href="#">Remove</a>

[<< Back](#)

Click on “Revoke All”  
to remove all assigned roles

Click check box  
next to role(s). Click add  
or remove



# EIV User Certification Process

- ◆ Users must be certified every calendar quarter to continue accessing EIV
- ◆ EIV will terminate user access and assigned roles if user is not certified by deadline (See slide 67)
- ◆ Users who are no longer with the agency or whose duties no longer require access should not be certified; PHA may manually terminate access (See slides 70-71)
- ◆ If access is terminated, PHA User Administrator will need to be reinstated by HUD FO and generate access requests for all other users whose access is terminated



# EIV User Certification Schedule

<b>QTR</b>	<b>Quarter Dates</b>	<b>Certify By</b>	<b>Access Terminated 12:00A.M., EST</b>
<b>1</b>	Jan. 1 – Mar. 31	April 29	April 30
<b>2</b>	Apr. 1 – June 30	July 30	July 31
<b>3</b>	July 1 – Sept. 30	Oct. 30	Oct. 31
<b>4</b>	Oct. 1 – Dec 31	Jan. 30	Jan. 31

Certification period begins 1<sup>st</sup> day after quarter ends

# EIV User Certification

## Certifying EIV Users

Enterprise Income Verification

[Home](#) [PIH Home](#) [EIV Home](#) [Search](#) [Email](#)

User Administration >> User Certification Selection

Select Region and Certification Criteria:

<input type="radio"/>	HUD HQ	
<input type="radio"/>	HUB	All
<input type="radio"/>	FO	All
<input type="radio"/>	TARC	All
<input checked="" type="radio"/>	PHA	All

Select Certification Status:

All

All

Pending Certification

Certified Only

List Users

Note: User Administrator certifies that the following documents are on file for each user being certified.

- Access Authorization Form
- User Agreement
- Rules of Behaviour

Select "Pending Certification"  
Status and Click "List Users"



# EIV User Certification

## Certifying EIV Users (Continued)

### Enterprise Income Verification

[HOB](#)[Home](#)[PIH Home](#)[EIV Home](#)[Search](#)[Email](#)

User Administration >> [User Certification Selection](#) >> User Certification

PHA: NJ009 Jersey City  
Housing Authority

Number of  
Users: 10

Certification  
Status:

Pending Certification

Change View

1 - 10 of 10 Users

#### List of Users and their Roles

User Name: Bibi Aziz PHA User Admin	User ID: ME0008	Last Certification Date: N/A	Certify User
User Name: James Cameron PHA Security Administrator	User ID: MS7846	Last Certification Date: N/A	Certify User
User Name: Marc-Josef Casupang PHA Occupancy - Voucher	User ID: MD6328	Last Certification Date: N/A	Certify User

Click on "Certify User"  
button to certify user

# User Administration

## User Maintenance

Enterprise Income Verification

[HUD](#)

[Home](#)

[PIH HomeEIV Home](#)

[Search](#)

[Email](#)

User Administration >> User Maintenance

Query/View users by User ID:

Search user

Enter User ID and click on  
“Get User Information”

# User Administration

## User Maintenance (Continued)

### Enterprise Income Verification

[HUD](#)[Home](#)[PIH Home](#)[EIV Home](#)[Search](#)[Email](#)

User Administration >> [User Maintenance](#) >> User Details

Enter a valid Expiration Date and click Update:

User ID	H18560
First Name	Nicole
Last Name	Lawyer
Code	P Assistant Secretary for Public & Indian Housi
Expiration Date in the format (mm/dd/yyyy) :	<input type="text"/>

**Enter date to  
terminate user  
access**



For Help with the EIV System

**EIV\_Help@ HUD.gov**


**Or Call (800) 366-6827**

**Or Contact the UIV Coordinator  
at your local HUD Field Office**



Visit HUD's Web Page For  
More Information on UIV

[www.hud.gov/offices/pih/programs/ph/rhiip/uiv.cfm](http://www.hud.gov/offices/pih/programs/ph/rhiip/uiv.cfm)



# Public Housing and Housing Choice Voucher Income and Rent Calculation On-Line Course

**\*\*\* FREE \*\*\***

- ◆ The new Income and Rent Calculation On-line Course is now available. The Department is confident that this course will help to achieve our goal of reducing income and rent errors that have the attention of the President and Congress
- ◆ Once registered you may access the course from your desktop at [www.upcstraining.com](http://www.upcstraining.com). To register for this course, please submit an email to [RentCal@hud.gov](mailto:RentCal@hud.gov) with your PHA name, PHA code, telephone number and email address for each participant
- ◆ For individuals that have already registered, but have not completed or attempted the course, the Department strongly encourages you to do so





# Question & Answer Session With HUD Panel